

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

HOLLINGSWORTH, ROTHWELL &
ROXFORD ("HRR"); LAWRENCE
NIREN, THEODORE ROXFORD,

Defendants.

No. 07-Civ. 6146 (PKC)

INITIAL DISCLOSURES OF PRO SE LAWRENCE NIREN/THEODORE ROXFORD

Lawrence Niren/Theodore Roxford ("Niren" or "Roxford") hereby makes his initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

1. Pursuant to Rule 26(a)(1)(A), Niren provides as Attachment "A" a list of persons likely to have discoverable information that Niren may use in his defense.

2. Pursuant to Rule 26(a)(1)(B), the documents, data compilations, and tangible things that Niren may use to support his defense, as well as other documents not privileged or protected from disclosures, will be made available for inspection and copying at a reasonable time, place and manner under Federal Rule of Civil Procedure 34, by arrangement through Niren/Roxford at one of the Argentine law firms that represent Niren/Roxford here in Argentina, which Niren/Roxford would give the names of to the SEC once it is 100% determined that this Court has jurisdiction and venue, which is impossible for it to have. Those documents would include, among other things, the following:

a. Dozens of agreements, contracts, banking arrangements, minutes of meetings, financings, letters, proof of financings and bank backing for deals, documents produced by third parties, proof of Niren's and HRR's innocence, proof of perjury of the SEC's Pamela Nolan, proof of fraud on the part of the SEC, and many other original documents which are all in Buenos Aires, Mendoza, Cordoba, Patagonia, Mar del Plata, and other parts of Argentina. The Argentine owners of HRR do not use or trust emails, so everything is in original form, and not in emails, and in over 40 boxes in Argentina.

3. Pursuant to Rule 26(a)(1)(C) is not applicable.
4. Pursuant to Rule 26(a)(1)(D), Niren states that there are none.

Respectfully submitted,

Lawrence Niren

Lawrence Niren aka Theodore Roxford
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Executed on October 3, 2007
Buenos Aires, Argentina

ATTACHMENT A

1. Pamela Nolan of the U.S. Securities & Exchange Commission Washington, D.C. (information relating to her perjured Affidavit).
2. Lawrence Renbaum of the U.S. Securities & Exchange Commission¹ Washington D.C. (information relating to proof of intent of Niren and HRR to genuinely succeed with all of their deals, and fraud on the part of the SEC).
3. Andrew Milligan of ValGold Resources Vancouver, B.C. (information relating to proof of merger and acquisition abilities, successes, and intent of Niren to put together M&A deals for over 25 years).
4. Anthony LaPine, CEO of Semotus Solutions Los Gatos (San Jose) Cal. (information relating to confidential and private discussed partnership of HRR and Semotus to jointly acquire Edgetech in 2003).
5. More than a dozen members of the Barahona and Ferrari families in Argentina. (information relating to proof of all of Niren's and HRR's deals being genuine). (their contact information will be made through Niren's law firms in Argentina).²
6. Around ten to twelve bankers in Argentina. (information relating to proof of financing for all of the deals of Niren and HRR). (their contact information will be made through Niren's law firms in Argentina).³

¹ Most, if not all, of the SEC's list of "other individuals believed to have information about the facts and circumstances underlying the claims in the SEC's Complaint" (which, by the way, HMRR, Niren, and HRR gave the names and contact information to the SEC in early 2003), are going to confirm that HMRR, Niren, and HRR genuinely intended to put together all of their deals. Yet the SEC wants this Court to rule in their favor, even when it can be confirmed by all the witnesses that Niren and HRR contacted over 100 different parties around the world to genuinely try to put together all of their deals, so that there is no question that Niren's and HRR's intent was to genuinely succeed with every deal. Lawrence Renbaum of the SEC will be able to confirm Niren's and HRR's intent to put together all of their deals. The SEC actually wants this Court to rule in its favor for Niren's and HRR's intent to genuinely put together all of their deals! This is ridiculous on the part of the SEC, and a complete waste of this Court's time, as this Court knows very well that the SEC's complaint must fail if HRR's and Niren's intent was to genuinely succeed with all their deals.

² Due to the fact that there has just this week been a very sad and tragic death in the Barahona and Ferrari families who are the Argentine owners of HRR, Niren has to wait until a period of mourning has passed, before he can approach the Barahona and Ferrari families to ask them exactly which members of the families will be testifying now, as things may have changed by this sudden death of one of the founding members of the families. Niren will provide the Court and the SEC with this exact information shortly.

³ See footnote 3 above, as Niren has to ask the Barahona and Ferrari families which of the many bankers they use on a regular basis - who agreed to finance all of Niren's and HRR's deals, that they wish to testify for this case on behalf of Niren and HRR, and this is not a good time to approach the families during their present mourning, about matters that are unrelated to the tragic passing of their close family member.

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CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2007, I caused a copy of the foregoing Initial Disclosures of Pro Se Lawrence Niren/Theodore Roxford, the Notice of the Emergency Motion, the Emergency Motion For Adjournment, and the Affidavit In Support of the Emergency Motion, to be served on the following:

By email to:

Sarah L. Levine, Attorney for Plaintiff
levinesa@sec.gov

And also by email to:

Richard E. Simpson, Attorney for Plaintiff
simpsonr@sec.gov

Lawrence Niren

Lawrence Niren aka Theodore Roxford

Executed on October 3, 2007
Buenos Aires, Argentina

Lawrence Niren

Lawrence Niren aka Theodore Roxford
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